

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

J.K.J.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 15-cv-0428-wmc
)	
POLK COUNTY and DARRYL L.)	
CHRISTENSEN,)	
)	
Defendants.)	Hon. William M. Conley

and

M.J.J.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 15-cv-0433-wmc
)	
POLK COUNTY and DARRYL L.)	
CHRISTENSEN,)	
)	
Defendants.)	Hon. William M. Conley

**JOINT MOTION TO TERMINATE PLAINTIFFS' SUPPLEMENTAL
PETITION FOR ATTORNEYS' FEES AND COSTS AND POLK COUNTY'S
MOTION TO STAY EXECUTION OF JUDGMENT**

Plaintiffs, J.K.J. and M.J.J., and Defendant Polk County, by their respective attorneys, hereby move the Court as follows:

1. On June 16, 2020, Plaintiffs filed a supplemental petition for attorneys' fees and costs. Dkt. 335.¹ Polk County filed a response seeking a reduction in the

¹ For ease of reading, all record cites are to *J.K.J. v. Polk County and Christensen*, Case No. 15-cv-428-wmc (W.D. Wis.)

attorney hours sought to be compensated by Plaintiffs, though not disputing the hourly rates sought, and the motion is fully briefed. Dkt. 339; *see also* Dkt. 348.

2. On September 29, 2020, Polk County filed a petition for a writ of certiorari with the United States Supreme Court. Plaintiffs filed a brief in opposition to the petition on December 9, 2020. The Supreme Court denied Polk County's petition on January 11, 2021.

3. The parties have since reached an agreement regarding Plaintiffs' claims for attorneys' fees and costs, including those fees sought in Plaintiffs' pending supplemental petition, as well as fees and costs incurred after the supplemental petition was filed.

4. Accordingly, the parties jointly move to terminate Plaintiffs' pending supplemental fee petition. Dkt. 335.

5. Similarly, the parties jointly move to terminate Polk County's pending motion to stay execution of judgment. Dkt. 336.

Respectfully submitted,

/s/ Steve Art
Steve Art
Attorney for Plaintiffs

/s/ Paul Cranley
Paul Cranley
Attorney for Polk County

Jon Loevy
Steve Art
Sarah Grady
Megan Pierce
LOEVY & LOEVY

Paul Cranley
Husch Blackwell
33 East Main St., Ste. 300
Madison, WI 53703
(608) 258-7124

311 N. Aberdeen Street
Chicago, IL 60607
(312) 243-5900
steve@loevy.com

Adam Francois Watkins
WATKINS BRADLEY LLP
228 Park Ave. South #14905
New York, NY 10003
(212) 937-4281

Tom Weidner
Lida Bannink
ECKBERG LAMMERS, P.C.
1809 Northwestern Ave.
Stillwater, MN 55082
(651) 439-2878

CERTIFICATE OF SERVICE

I, Steve Art, an attorney, hereby certify that on March 25, 2021, I caused the foregoing to be filed using the Court's CM/ECF system, which effected service on all counsel of record.

/s/ Steve Art
Steve Art
Attorney for Plaintiff